

FILED

AUG 15 2023
By DAVID CREWS CLERK Deputy

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 4:23-CR- 116

DERRICK STEWART, JR. A/K/A "50 SHOT" A/K/A "DJ"
A/K/A "JOHN ADAMS"
RONNELL PRATT A/K/A "PJ"
JARVIS HOOD

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 922(a)(5)
18 U.S.C. § 924(a)(1)(A)
18 U.S.C. § 933(a)(2)
18 U.S.C. § 933(a)(3)
18 U.S.C. § 933(b)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

From a time unknown to the Grand Jury, but at least beginning on or about July 2, 2021, up until on or about November 1, 2022, in the Northern District of Mississippi and elsewhere, the defendants, DERRICK STEWART, JR., RONNELL PRATT AND JARVIS HOOD, along with Jalene Jamon Young and Markeveon Jarice Lemond Brown, not defendants in this Indictment, knowingly and willfully conspired and agreed with each other and with other persons both known and unknown to the Grand Jury, to commit offenses against the United States, that is:

- a) Making a False Statement During Purchase of a Firearm, in violation of Title 18, Section 924(a)(1)(A).
- b) Transfer by Unlicensed Dealer of a Firearm to a Person Residing Outside of Unlicensed

Dealer's State of Residence, in violation of Title 18, United States Code, Section 922(a)(5).

MANNER AND MEANS

1. It was part of the conspiracy that the co-conspirators would and did play different roles in the conspiracy, take upon themselves different tasks, and participate in making false statements in connection with the purchase of a firearm, transferring firearms to persons residing in another state and firearms trafficking, in Washington County and Madison County, Mississippi; Cook County, Illinois; and locations unknown to the Grand Jury.

- a. It was part of the conspiracy that DERRICK STEWART, JR. AND RONNELL PRATT were residents of the State of Illinois.
- b. It was further part of the conspiracy that DERRICK STEWART, JR. AND RONNELL PRATT would recruit and use other persons who were residents of the Northern District of Mississippi, including JARVIS HOOD, Jalene Jamon Young and Markeveon Jarice Lemond Brown, who are not defendants in this Indictment, to purchase firearms from licensed firearms dealers in the Northern District of Mississippi and elsewhere. Such persons are known as "straw purchasers" of firearms because they serve as intermediaries for a person who cannot buy or own a firearm, or who wants to conceal his purchase of a firearm.
- c. It was part of the conspiracy that DERRICK STEWART, JR., RONNELL PRATT, JARVIS HOOD, Jalene Jamon Young and Markeveon Jarice Lemond Brown are not federally firearms licensed dealers.

- d. It was part of the conspiracy that certain co-conspirators would provide United States currency to other co-conspirators to fund purchases of firearms from federal firearms licensees.
- e. It was part of the conspiracy that certain co-conspirators were drivers which assisted in the transportation of purchasers to federal firearms licensees.
- f. It was part of the conspiracy that certain co-conspirators booked and funded transportation for other co-conspirators which assisted in the transport of firearms to another state.
- g. It was part of the conspiracy that after purchasing firearms, certain co-conspirators would transfer the firearms to other co-conspirators who resided in another state, namely Illinois.
- h. It was part of the conspiracy that certain co-conspirators would utilize social media to discuss pricing of firearms to sell post-purchase and to discuss travel arrangements from Mississippi to Chicago, Illinois.
- i. It was part of the conspiracy that after receiving the firearms, certain co-conspirators, including DERRICK STEWART, JR. would travel by Amtrak train from the Northern District of Mississippi to Chicago, Illinois.
- j. It was part of the conspiracy that after receiving and transporting the firearms to the State of Illinois, certain co-conspirators would transfer or sell the firearms to other individuals in the State of Illinois.

OVERT ACTS

2. During the conspiracy one or more co-conspirators committed one or more of the following overt acts in furtherance of the conspiracy:

- a. On or about July 2, 2021, July 3, 2021, and July 19, 2021, DERRICK STEWART, JR. provided United States currency to Markeveon Jarice Lemond Brown, not a defendant in this Superseding Indictment, for purchases of multiple firearms from Bullfrog Corner Pawn, in Horn Lake, Desoto County, Mississippi and Renegade Firearms in Greenville, Washington County, Mississippi.
- b. During the purchases, Markeveon Jarice Lemond Brown represented to federal firearms licensee employees on ATF Forms 4473 documenting said purchases that he was the actual buyer of the firearms.
- c. On the dates listed in paragraph (a), Markeveon Jarice Lemond Brown transferred the firearms he purchased to DERRICK STEWART, JR., a resident of the State of Illinois.
- d. On or about March 16, 2022, April 14, 2022, June 15, 2022, July 13, 2022, July 14, 2022, July 20, 2022, and other dates, DERRICK STEWART, JR. AND RONNELL PRATT provided United States currency to Jalene Jamon Young, not a defendant to this Indictment, for purchases of multiple firearms from Renegade Firearms in Greenville, Washington County, Mississippi.
- e. During the purchases, Jalene Jamon Young represented to federal firearms licensee employees on ATF Forms 4473 documenting said purchases that he was the actual buyer of the firearms.

- f. On the dates listed in paragraph (d), Jalene Jamon Young transferred the firearms he purchased to DERRICK STEWART, JR. AND RONNELL PRATT, residents of the State of Illinois.
- g. Specifically, on or about July 14, 2022, DERRICK STEWART, JR., RONNELL PRATT, Jalene Jamon Young and Markeveon Jarice Lemond Brown, not defendants to this Indictment, traveled in a vehicle to Renegade Firearms in Greenville, Mississippi.
- h. Prior to the July 14, 2022, firearms purchase, DERRICK STEWART, JR. provided United States currency to Jalene Jamon Young to purchase firearms at Renegade Firearms. On this date, Markeveon Jarice Lemond Brown accompanied Young into the store. Brown then exited the store and RONNELL PRATT provided United States currency to Brown for Jalene Jamon Young to complete the sale. After the sale, the firearms were transferred to DERRICK STEWART, JR.
- i. On or about September 20, 2022, RONNELL PRATT provided a screenshot of an Amtrak travel reservation to JARVIS HOOD via Facebook messenger and asked, “you on?” JARVIS HOOD responded, “Yea.”
- j. On or about September 27, 2022, JARVIS HOOD purchased three firearms at Academy Sports in Madison, Mississippi. On the same day, JARVIS HOOD sent a Facebook message to RONNELL PRATT stating, “book me a ticket” and “you booked it.”

k. On or about September 28, 2022, JARVIS HOOD was arrested in Chicago, Illinois.

l. On or about September 30, 2022, JARVIS HOOD and DERRICK STEWART, JR. exchanged Facebook messenger communications discussing the selling or transfer of firearms and that the profit would be split between the two and RONNELL PRATT.

All in violation of Title 18, Section 371.

COUNT TWO

From on or about July 2, 2021, to on or about November 1, 2022, in the Northern District of Mississippi and elsewhere, the defendants, DERRICK STEWART, JR. AND RONNELL PRATT did combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to attempt to receive and receive from another person, in or otherwise affecting interstate or foreign commerce, one or more firearms, knowing or having reasonable cause to believe that such receipt would constitute a felony, in violation of Title 18, United States Code, Section 933(a)(2) and (3).

COUNT THREE

On or about April 13, 2022, in the Northern District of Mississippi, DERRICK STEWART, JR. AND RONNELL PRATT did aid and abet Jalene Jamon Young, not a defendant to this Indictment, who knowingly made a false statement and representation to a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of

Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, in connection with the purchase of a Glock model 22 40 S&W caliber pistol and a Glock model 23 40 S&W caliber pistol, certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, including DERRICK STEWART, JR., in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FOUR

On or about June 15, 2022, in the Northern District of Mississippi, DERRICK STEWART, JR. AND RONNELL PRATT did aid and abet Jalene Jamon Young, not a defendant to this Indictment, to knowingly made a false statement and representation to a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, in connection with the following firearms:

Make	Model	Caliber
Glock	22	40 S&W
Glock	22	40 S&W
Glock	30	45 ACP
Glock	27	40 S&W
Glock	21	45 ACP
Glock	20	10mm

certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, including DERRICK STEWART, JR., in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT FIVE

On or about July 13, 2022, in the Northern District of Mississippi, DERRICK STEWART, JR. AND RONNELL PRATT did aid and abet Jalene Jamon Young, not a defendant to this Indictment, to knowingly made a false statement and representation to a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, in connection with the following firearms:

Make	Model	Caliber
Glock	27	40 S&W
Glock	26	9mm
Glock	19	9mm
Glock	22	40 S&W
Glock	23	40 S&W
Glock	45	9mm

certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT SIX

On or about July 14, 2022, in the Northern District of Mississippi, DERRICK STEWART, JR. AND RONNELL PRATT did aid and abet Jalene Jamon Young, not a defendant to this Indictment, to knowingly made a false statement and representation to a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to

information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, in connection with the purchase of two Glock model 30, 45 caliber pistols, certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, including DERRICK STEWART, JR., in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).

COUNT SEVEN

On or about July 20, 2022, in the Northern District of Mississippi, DERRICK STEWART, JR. AND RONNELL PRATT did aid and abet Jalene Jamon Young, not a defendant to this Indictment, to knowingly made a false statement and representation to a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Renegade Firearms, in that the defendant did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, in connection with the purchase of the following firearms:

Make	Model	Caliber
Glock	G30	45 ACP
Glock	G36	45 ACP
Glock	G21	45 ACP
Glock	G23	40 S&W
Glock	G23	40 S&W
Glock	G17	9mm
Glock	G17	9mm

certifying that he was the actual buyer of the firearms, whereas in truth and in fact, he was purchasing the firearms for another individual, including DERRICK STEWART, JR., in violation of Title 18, United States Code, Sections 2 and 924(a)(1)(A).



CLAY JOYNER
UNITED STATES ATTORNEY

A TRUE BILL:

/s/ Redacted Signature

FOREPERSON